

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

JOHN R. GRIFFIN, JR.,

Plaintiff,

v.

BURNDY, LLC AND  
HUBBELL INCORPORATED

Defendant.

1:24-cv-141-LM-AJ

**DEFENDANTS' MOTION TO DISMISS THE AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 12(b)(6), Defendants Burndy, LLC and Hubbell Incorporated<sup>1</sup> (collectively “Defendants”), by and through their attorneys, Jackson Lewis P.C., respectfully move to dismiss the Amended Complaint filed by *pro se* Plaintiff John R. Griffin, Jr. (“Plaintiff”). In support of this Motion, Defendants state as follows:

1. In the Amended Complaint, Plaintiff asserts four claims: hostile work environment, retaliation, and reverse discrimination claims under both Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, and RSA chapter 354-A, as well as, a claim under the Whistleblowers’ Protection Act, RSA chapter 275-E.

2. For the reasons stated in Defendants’ Memorandum of Law in Support of Their Motion to Dismiss the Amended Complaint, this Court should dismiss the Amended Complaint, as a matter of law, for failure to state a claim upon which relief can be granted, because the Amended Complaint fails to set forth any plausible claim for relief.

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<sup>1</sup> Plaintiff’s former employer is Burndy, LLC and not “Hubbell Corporation” which, upon information and belief, refers to Burndy, LLC’s parent company, Hubbell Incorporated.

3. Defendants' Memorandum of Law in Support of Their Motion to Dismiss the Amended Complaint is filed herewith.

4. Due to the dispositive nature of this Motion, the concurrence of Plaintiff was not sought for the relief requested in this Motion.

WHEREFORE, Defendants request that this Court:

- A. Grant this Motion;
- B. Dismiss the Amended Complaint in its entirety with prejudice; and
- C. Grant such other relief as this Court deems just and proper.

Respectfully Submitted,

BURNDY, LLC and  
HUBBELL INCORPORATED

By their attorneys,  
JACKSON LEWIS P.C.,

Date: April 1, 2025

By: /s/ Kevin M. Sibbernson  
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Certificate of Service

I hereby certify that on this date a copy of the foregoing pleading has been filed via the Court's electronic filing system and has been served via first class mail on:

John R. Griffin  
#22976  
Merrimack County HOC  
315 Daniel Webster HWY  
Boscawen, NH 03303

Date: April 1, 2025

/s/ Kevin M. Sibbernsen  
Kevin M. Sibbernsen

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